

NORTH CENTRAL ELBERT COUNTY
VOLUNTEER FIRE DEPT., INC.

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MAY 24 1993

FEDERAL COMMUNICATIONS COMMISSION
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May 18, 1993

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Ms. Donna R. Searcy, Secretary
Federal Communications Commission
1919 M Street
Washington, D.C. 20554

MAY 24 1993

RE: PR Docket No. 92-235

FCC - MAIL ROOM

Dear Ms. Searcy:

Please accept the enclosed comments on FCC Docket No. 92-



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FEDERAL COMMUNICATIONS COMMISSION

The following comments on Docket 92-208 are submitted to the Federal Communications Commission by the North Central Elbert County (Colorado) Volunteer Fire Department, Inc.

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1) Background:

The North Central Elbert County Volunteer Fire Department, Inc. (NCECVFD) was incorporated as a Colorado Non-Profit Corporation on May 28, 1982. This group of citizens have been designated by the Elbert County Commissioners to provide fire and emergency services to property owners in an area of approximately 140 square miles of the County.

Unlike most fire departments in the U.S., NCECVFD is a private corporation, has no taxing authority, and receives no public assistance. We rely solely on contributions and revenue derived from raffle ticket and bakery goods sales. Needless to say, this does not provide a very strong financial base and thus the Department makes extensive use of used and surplus fire fighting equipment, including communications.

This fire department possesses an FCC license to operate radio communications equipment on two simplex frequencies in the low end of the 150-174 MHz band. We share those channels with three other fire departments in Elbert County and the U.S. Forest Service. Our radio equipment consists of units which were given us by other more affluent departments when they upgraded their systems. The equipment was installed and is maintained by a licensed radio engineer who volunteers his services to the Department. NCECVFD operations are dispatched by the Elbert County Sheriff's Department.

2) Specific Comments on Docket 92-235:

By using one of the several personal computer based terrain analysis programs currently available it is possible to design a communications system to serve just about any area in the U.S.. Computer design of base station to mobile unit communications systems should be undertaken for each licensee BEFORE wholesale changes in spectrum occupancy and permissible power levels are imposed on everyone. In the nearly five years we have operated on shared channels we have not had one instance of interference from other users. If the local

NCECVFD operations are frequently in a mutual-aid setting. In these situations we must be able to communicate effectively with other fire departments, and county, state and federal government agencies. Thus, it is essential that communications equipment be compatible. If Docket 92-235 is enacted and conversion to different technology begins we will no longer be able to communicate as the more affluent agencies convert. This loss may adversely affect life and property saving operations with unpredictable consequences.

We believe public safety to be the most important part of the Land Mobile Radio Services. This is because life and property saving operations constitute the highest and best use of the radio spectrum. Therefore, the channels set aside for Public Safety should remain dedicated to this service without compromise. We oppose the intrusion of other services into or immediately adjacent to "our" spectrum just because those services have outgrown the spectrum assigned to them. In particular, operation of high power pagers adjacent to Public Safety spectrum will exacerbate cross modulation and splatter problems especially when we must reduce transmitter deviations.

3) Conclusions:

The FCC Commissioners will recognize and appreciate that under the constraints imposed on our Department, the entire NCECVFD budget is spent on fire fighting activities, keeping equipment serviceable, and training. There is no money to purchase new equipment. Moreover, with the enactment of Amendment 1 to the Colorado Constitution by voters last November, it is highly unlikely that local citizens will agree